

15

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RECEIVED

SEP 27 2019

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Jerry A Beauford

Plaintiff(s),

vs.

Pace Bus Co.

Judge Carrie E Hamilton

Defendant(s).

1:19-cv-06509

Judge Sharon Johnson Coleman  
Magistrate Judge Jeffrey Cummings

**COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS**

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Jerry Alva Beauford.

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

4. Defendant, N/A, is  
(name, badge number if known)
- ☐ an officer or official employed by CIRCUIT COURT-2144;  
(department or agency of government)  
COOK COUNTY ILLINOIS 6<sup>TH</sup> DISTRICT or
- ☐ an individual not employed by a governmental entity.

*If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.*

5. The municipality, township or county under whose authority defendant officer or official acted is N/A. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.
6. On or about N/A, at approximately N/A ☐ a.m. ☐ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of N/A  
N/A, in the County of N/A,  
State of Illinois, at N/A,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☒ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:

JUDGE HAMILTON REFUSE TO EXCEPT THE REQUEST  
TO FIRE "VRDOLYAK LAW GROUP ON 6-10-19"

## GIVING VRODYAK Time To File False STATEMENTS

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged)*: N/A

8. Plaintiff was charged with one or more crimes, specifically:

N/A

9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings

☒ are still pending.

☒ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>

☒ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows N/A

☐ Other: \_\_\_\_\_

<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: (Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)

PLAINTIFF APPEARED BEFORE JUDGE HAMILTON ON  
JANUARY 20, 2019 AT THAT TIME MR. PATRICK CROWLEY  
WAS THERE WITH DEFENDANT PACE OFFER BEFORE  
THE JUDGE. "PLAINTIFF STATED THAT HE WANTED  
A JURY TRIAL". JUDGE HAMILTON RELATED THE  
"JURY WILL NOT SEE ALL OF THE EVIDENCE". TWO  
PEACE OF EVIDENCES, PACE BUS VIDEO, OF THE  
REAR END COLLISION, PLAINTIFF DOCTORS SURGEON  
EVALUATION OF THE WHIPLASH INJURIES". PLAINTIFF  
"VERY BOLDLY" FIRED "VRDOLYAK LAW GROUP THAT  
DAY" RELATING TO "MR. CROWLEY THAT HE DID NOT  
WANT HIM, OR THAT JUDGE, THE BOTH OF THEM" IS  
IN FAVOR OF PACE BUS CO. "CHANGE OF VENUE NOW!"

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

"JUDGE HAMILTON ON THE 10<sup>th</sup> OF JUNE 2019 WOULD  
NOT EXCEPT PLAINTIFF MOTION TELLING THE COURT THAT  
HIS ATTORNEYS WAS "FIRED". THAT GAVE THE FIRED  
ATTORNEYS THE OPPORTUNITY TO FILE FALSE DOCUMENT IN  
HIS CASE. EXHIBIT-

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

**WHEREFORE**, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Jerry Allen Beauford

Plaintiff's name (print clearly or type): Jerry A. Beauford

Plaintiff's mailing address: 535 Logan Dr Apt 604

City Hammond State IN ZIP 46320

Plaintiff's telephone number: (219) 240-7318

Plaintiff's email address (if you prefer to be contacted by email): N/A

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

*If yes, please list the cases below.*

**Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.**

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Jerry Beauford

Plaintiff(s)

v.

Pace Bus Co.

Defendant(s)

No. 2015 L 066002

TO: CHIEF JUDGE OF COOK COUNTY

MOTION BY PLAINTIFF(S) REQUEST FOR The Removal of His  
 ATTORNEYS. For Failing To comply with The Client Attorney Agreement  
 CONTRACT. SPECIFICALLY COURT PROCEEDING COPY OF ALL MOTIONS, AND  
 DOCTORS DEPOSITIONS. For Changing my Attorney on The Case, Whom  
 I Disagree with. DEPOSITIONS DOCTORS UNDERKNOW TO ME THAT IS A NO-NO.  
 This Law Firm Have never in 5 Years Pick UP one medical  
 Record And ASK me IF The Record Speak The TRUTH About  
 MY injury, OR The Treatment That I have Receive For The injury.  
 IF ANY DOCTOR have ANY THING To SAY About me, OR MY Condition  
 I Sure WANT To Be Present. I have Tried To Reach The  
 Head Attorney At this Law Firm To Amend MY Case OR Send  
 me Their Letter of With Drawer. They has Fail To do so,  
 PLAINTIFF Respectfully ASK This Honorable Court To Intervene.  
 IN This matter, The ATTORNEYS have Breach The CONTRACT.  
 IN This Case,

I (We) do hereby certify that a copy of this instrument was served upon all parties who have appeared  
 and have not previously been found by the Court to be in default for failure to plead.

Dated: JUNE 10, 2019 Representing myself For  
 The Time Being. Attorney Certification

Atty. No.:

Name: Jerry Beauford. PLAINTIFF

Atty. for: (Fired) - VADOLYAK LOW GROUP, LLC. X

Address: 9618 Commercial Avenue

City/State/Zip: CHICAGO IL 60617

Telephone:

Xhibit 1

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

4217

Order (Continuance) (This form replaces CCM1 0606 and CCMD 623-2 thru 6)

(1/25/05) CCM N606

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
MUNICIPAL DEPARTMENT 6<sup>th</sup> DISTRICT

Law

Beauford

Plaintiff(s)

v.

No. 15 L 66002Pace

Defendant(s)

Agreed  
CONTINUANCE ORDERThis matter having come before this Court for ☒ status ☐ pretrial ☐ trial☐ other: probate petition

the Court being fully advised;

IT IS HEREBY ORDERED that this matter is continued to June 10, 2019  
(date)at 9:00 a.m./p.m. in Room 208 for:☒ status (4406) ☐ pretrial (4405) ☐ trial (4482)☐ other: Status on probateJudge Carrie E. Hamilton  
MAR 08 2019  
Circuit Court-2144

(Please print)

Atty. No.: 41535Name: VLL-AIBAttorney for: TIAddress: 100 N. RiversideCity/State/Zip: Chicago, IL, 60606Telephone: 312 482 8200

ENTERED:

Dated: \_\_\_\_\_

Judge

Judge's No.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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1012  
 \* Zibi June 25-2019

IN The Circuit Court of Cook County  
ILLINOIS

Jerry BeauFord

V. PLAINTIFFS

PACe BUS Co

Defendants

No. 2015L066002

To: The Chief Judge of Cook County  
Illinois.

MOTION BY PLAINTIFF STATING THE  
 FOLLOWING HE HAS "FIRED" HIS ATTORNEYS, THE  
 VRDOLYAK LAW GROUP, FOR FAILING TO  
 COMPLY WITH ATTORNEY CLIENT CONTRACT.  
 HE WAS NOT INFORMED OF THE MOTIONS THAT WAS  
 FILED IN HIS CASE, OR THE COURT SCHEDULED  
 MATTERS.

THE VRDOLYAK ATTORNEYS WITH THE HELP  
 OF THE CIRCUIT COURT OF COOK COUNTY  
 WAS ABLE TO "UNLAWFULLY" CONTINUE THE CASE  
 WITHOUT PLAINTIFF HAVING ANY KNOWLEDGE,  
 OF WHAT WAS HAPPENING WITH HIS CASE UNTIL IT  
 HAD TAKEN PLACE. "PLAINTIFF WENT TO HIS  
 COURT DATE JUNE 10 2019" THE CASE HAD BEEN  
 "UNLAWFULLY" MOVED TO THE PROBATE DIVISION.  
 PLAINTIFF IS ASKING FOR CHANGE OF VENUE, MOVING HIS CASE  
 FROM ILLINOIS, TO "INDIANA" OR THE "FEDERAL COURT."



The ACTION OF VRDOLYAK LAW GROUP  
AND WHO EVER GAVE THEM A CONTINUE COURT  
DATE, "ON JUNE 19, 2019 FOR 8-19-2019"  
COURT DATE, "UNDERKNOWN TO PLAINTIFF"  
IS A "VIOLATION OF HIS ILLINOIS CONSTITUTION  
RIGHTS." ARTICLE 1. BILL OF RIGHTS. SECTIONS  
(2) (12) (13) - HAS THE WORD "SHALL" IN IT MANDATORY,  
"INDICATES LEGISLATIVE INTENT TO MAKE THE LAW MANDATORY."  
See - PUSS N BOOTS V. MAYORS License Com'n  
Cite as 173 Ill. Dec. 676, 597 NE2d 650  
(ILL. APP. 1 DIST. 1999)

"The SAID LAW AUTHORITY'S" COOK COUNTY  
CIRCUIT COURT LOOKED THE OTHER WAY WHILE THE  
VRDOLYAK LAW GROUP VIOLATED THE PLAINTIFF  
CONSTITUTION AMENDMENT (14<sup>TH</sup> 15<sup>TH</sup> 17<sup>TH</sup>); RIGHTS  
AND THE RIGHTS GUARANTEED FOR HIM UNDER  
THE U.S. CONSTITUTION, ILLINOIS CONSTITUTION, ARTICLE (1)  
BILL OF RIGHTS, SECTION 2, 12, 13,  
VRDOLYAK LAW GROUP LLC HAVE DELIBERATELY BROKE  
THE CONTRACT, AND VIOLATED MY CONSTITUTION  
RIGHTS. THEIR VIOLATED SERVICE IS NOT WANTED  
ANY FATHER. THEY ARE "FIED".

PLAINTIFF RESPECTFULLY ASK "CHIEF JUDGE" TO  
INVESTIGATE THE ABOVE ALLEGATIONS.

Jerry Baugher  
2019

Exhibit (3)